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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF DEFENDANTS  
UBER TECHNOLOGIES, INC., RASIER,  
LLC, AND RASIER-CA, LLC'S MOTION  
TO EXCLUDE OPINIONS OF PLAINTIFFS'  
EXPERT LACEY KELLER**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

Judge: Mag. Lisa J. Cisneros  
Courtroom: G – 15th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California  
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber  
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal  
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would  
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of the September 26, 2025 Report of Lacey  
8 R. Keller.

9 3. Attached as **Exhibit 2** is a true and correct copy of the October 27, 2025 Deposition  
10 Transcript of Lacey Keller.

11 4. Attached as **Exhibit 3** is a true and correct copy of the September 26, 2025 Report of  
12 Victoria Stodden, Ph.D.

13 I declare under penalty of perjury under the laws of the United States and the State of California  
14 that the foregoing is true and correct.

15 Executed on November 10, 2025, in San Francisco, California.

16 /s/ Laura Vartain Horn

17 Laura Vartain Horn  
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**E-FILING ATTESTATION**

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn  
Laura Vartain Horn

# **EXHIBIT 1**

## **FILED UNDER SEAL**

# **EXHIBIT 2**

## **FILED UNDER SEAL**

# **EXHIBIT 3**

## **FILED UNDER SEAL**